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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**ESTAD PRODUCTS, INC.
(FORMERLY ATI, INC. - CONTINENTAL DIVISION)
DANVILLE, ILLINOIS
ILD 007 833 833**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Estad Products, Inc. (Estad), facility (formerly known as the Aerosol Techniques, Inc. - Continental Division (ATI), facility) in Danville, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

Estad purchased this facility and began operations at this location in about 1984. Estad is a wholly-owned subsidiary of the Handy Button Machine Company located in Chicago, Illinois. Estad manufactures hardware for casket shells, accessories for 55-gallon drums, joint nails for the furniture industry, and "moving bars" used by the commercial moving industry. Operations include stamping, welding, and painting steel parts. Estad does not and has not generated a hazardous waste stream at this facility. Estad currently generates nonhazardous waste oil with water and scrap steel.

Estad employs approximately 85 people at this facility, 60 of whom work in the manufacturing areas. The facility occupies about 10 acres and consists of one 200,000-square-foot building, a paved parking area, and a large, undeveloped grassy area, part of which is surrounded by an eight-foot high chain-link fence with barbed wire along the top. Estad only conducts operations in 100,000 square feet of the building; Estad leases the remaining 100,000 square feet to Central States Distribution Services Corporation (CSDSC), for use as a warehouse for commercial goods. CSDSC does not generate waste at this location.

Prior to 1984, ATI owned and operated the facility. ATI manufactured and packaged cosmetic, household, pharmaceutical, medicinal, and automotive products in aerosol, liquid, and solid stick forms. There was no information available during the VSI, nor in EPA or IEPA files at the time of the VSI regarding the types of processes involved in ATI's manufacturing operations. According to the facility's 1980 Notification of Hazardous Waste Activity (Notification), ATI generated the following hazardous wastes: spent halogenated solvents (F002); spent nonhalogenated solvents (F005); waste acetone (U002); waste formaldehyde (U122); waste methanol (U154); waste tetrachloroethene (U210); waste toluene (U220); and waste tetrachloroethane (U226). There was no further information available during the VSI, nor in EPA or IEPA files regarding any other hazardous or nonhazardous wastes generated by ATI. ATI ceased manufacturing operations at the facility around March 1982; however, ATI owned the facility and employed a clerical staff at the facility until about 1984.

There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding when ATI began operations at this location, the number of people employed at ATI, or the use of the facility prior to ATI's purchase of the facility. However, a 1973 aerial photograph indicates the facility was operating in 1973.

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ATI submitted a Notification as a generator of hazardous waste and a treatment, storage, and disposal (TSD) facility to EPA on November 19, 1980. ATI also submitted a Part A permit application (Part A) as a TSD facility to EPA on November 19, 1980. ATI's Part A was incomplete; only the first two pages of the Part A were submitted. The Part A did not list any process codes, unit capacities, estimated annual waste quantities, or waste codes. In a cover letter from ATI included with the facility's Notification and Part A, ATI stated it had submitted the Part A because of an on-site waste treatment system (Former Waste Treatment System - SWMU 1) at the facility. The cover letter also stated ATI was unable to complete the Part A at that time, but would forward a completed form as soon as possible. A copy of a completed Part A was not in EPA or IEPA files at the time of the PA/VSI. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding whether ATI ever conducted, or was required to conduct, RCRA closure at the facility; however, according to IEPA, the facility is not currently regulated as a hazardous waste generator under RCRA.

The PA/VSI identified the following five SWMUs at the facility:

Solid Waste Management Units

1. Former Waste Treatment System
2. Waste Oil With Water Collection Area
3. Waste Oil With Water Drum Storage Area
4. Scrap Steel Hoppers
5. Scrap Steel Rolloff Area

The PA/VSI did not identify any AOCs.

The potential for a release to on-site soil, ground water, surface water, or air from SWMUs 2, 3, 4, and 5 is low. SWMUs 2, 3, and 4 are located indoors on concrete floor with no drains. SWMUs 2 and 3 manage nonhazardous waste in closed 55-gallon steel drums situated on wood pallets and SWMU 4 manages nonhazardous solid pieces of steel. SWMU 5 manages nonhazardous solid pieces of steel and is located outdoors on a concrete surface with no drains. There is no history of documented releases from SWMUs at the facility.

The potential for a release to on-site soil and ground water from SWMU 1 is high. SWMU 1 consisted of an area containing two unlined lagoons. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding the release controls for this unit or types of liquid waste managed in this unit. However, the cover letter accompanying ATI's 1980 Notification and Part A indicated this unit managed hazardous wastes. Estad backfilled the lagoons with soil around 1984. Although the depth to ground water is not documented, the soil in the area of the facility consists of moderately permeable unconsolidated till.

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The potential for a release to surface water from SWMU 1 is moderate. There is a ravine located immediately northwest of this unit which slopes toward the Vermilion River. The Vermilion River is located about 0.5 mile northeast of the facility. The direction of ground-water flow in the area of the facility is not documented. However, based on topography and surface water in the vicinity, the direction of ground-water flow is likely to be north toward the Vermilion River. For this reason, there is also a moderate potential for a release to surface water from this unit via ground water discharge to the Vermilion River.

The potential for a release to air from SWMU 1 is low. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding the type of waste managed at this unit. Although there may have been a high potential for a historical release from this unit, there is a low potential for a future release to air because the unit has been inactive since before 1982 and Estad backfilled the lagoons with soil around 1984.

Ground water in the area of the facility is not used as a drinking water source. According to Mike Witt of the Danville Water Department, the City of Danville obtains its drinking water from surface water intakes on Lake Vermilion, which is located approximately 4 miles north and upstream of the facility along the Vermilion River.

Surface water runoff from the majority of the facility is directed toward one of several drains which discharge to the Danville Sanitation Department. Runoff from the northern-most corner of the facility is directed toward a drainage ditch which slopes toward the Vermilion River. The Vermilion River is the nearest surface water body, located about 0.5 mile northeast of the facility. The Vermilion River is used for recreational fishing, and receives treated sewage discharge as well as nontreated storm water runoff. The Vermilion River is not used for industrial or drinking water supplies downstream of the facility.

The nearest sensitive environment is the Vermilion River, located about 0.5 miles northeast of the facility. Other sensitive environments located in the area of the facility include Stoney and Lick Creeks, located about 1.5 and 2.0 miles east of the facility, respectively; several open-water ponds, each less than 2 acres in size and located within one mile southwest of the facility; and numerous open-water and forested ponds ranging in size from about 3 acres to about 10 acres. These creeks and ponds are occasionally used for recreational fishing, but are not used for industrial or drinking water supplies.

Access to the facility is not controlled, but the only waste Estad stores outdoors is nonhazardous scrap steel. Access to the building at the facility is controlled by an electronic security system. Access to SWMU 1 is controlled by an eight-foot high chain-link fence with barbed-wire. The nearest residences are located immediately adjacent to the northwest side of the facility. The nearest school, Southview Junior High School, is located approximately 0.2 mile southeast of the facility. There are 16 other schools located within 2 miles of the facility.

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Dynamac recommends no further action at this time for SWMUs 2, 3, 4, and 5. Dynamac recommends the facility conduct soil and ground water sampling at SWMU 1 to determine the extent of contamination from possible past releases of hazardous constituents, particularly volatile organic compounds. Dynamac also recommends the facility initiate closure activities for SWMU 1, as necessary.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Estad Products, Inc. (Estad), facility (formerly known as the Aerosol Techniques, Inc. - Continental Division (ATI) facility) in Danville, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, containers, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents in files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the Estad facility (EPA ID No. ILD 007 833 833) located in Danville, Vermilion County, Illinois. The PA was completed on November 16, 1992. Dynamac gathered and reviewed information from files at the Illinois Environmental Protection Agency (IEPA) Springfield, Illinois, office and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the National Oceanic and Atmospheric Administration (NOAA), the Soil Conservation Service (SCS), the U.S. Department of the Interior (USDI), and the U.S. Geological Survey (USGS).

Deborah Hall and Valerie Farrell of Dynamac conducted the VSI on November 18, 1992. The VSI included an interview with a facility representative and a walk-through inspection of the facility. Dynamac identified five SWMUs and no AOCs at the facility. Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized along with five inspection photographs in Attachment B. Field notes from the VSI are included in Attachment C. In addition, a 1973 aerial photograph of the facility is included in Attachment D.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Estad facility is located at 800 South Gilbert Street in Danville, Vermilion County, Illinois (latitude 40° 06' 40" N and longitude 87° 38' 00" W) (USGS, 1966), as shown in Figure 1. The facility occupies approximately 10 acres in a mixed commercial, industrial, and residential area.

The facility is bordered on the northwest by a Norfolk and Western rail line, across from which is a residential area; on the northeast by a residential area; on the southwest by Gilbert Street; and on the southeast by Highland Boulevard, across from which is Southview Junior High School.

2.2 FACILITY OPERATIONS

Estad purchased this facility and began operations at this location around 1984. Estad is a wholly-owned subsidiary of the Handy Button Machine Company located in Chicago, Illinois. Estad manufactures hardware for casket shells, accessories for 55-gallon drums, joint nails for the furniture industry, and "moving bars" used by the commercial moving industry. Operations include stamping, welding, and dip-painting of steel parts. Raw materials used during operations include steel, water-based primer paint, and lubricating oil. The facility stores the primer paint and lubricating oil in 55-gallon steel drums located indoors on a concrete floor. The facility also stores the raw steel indoors on a concrete-floored area.

Estad employs approximately 85 people at this facility, 60 of whom work in the manufacturing areas. The facility consists of one 200,000-square-foot building, a paved parking area, and a large, undeveloped grassy area, part of which is surrounded by an eight-foot high chain-link fence with barbed wire along the top. Estad only conducts operations in 100,000 square feet of the building; Estad leases the remaining 100,000 square feet to Central States Distribution Services Corporation (CSDSC), for use as a warehouse for commercial goods. Access to the facility is not controlled; however, access to the building is controlled by an electronic security system.

Solid waste generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

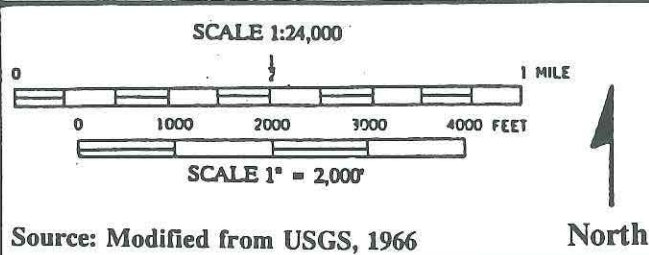
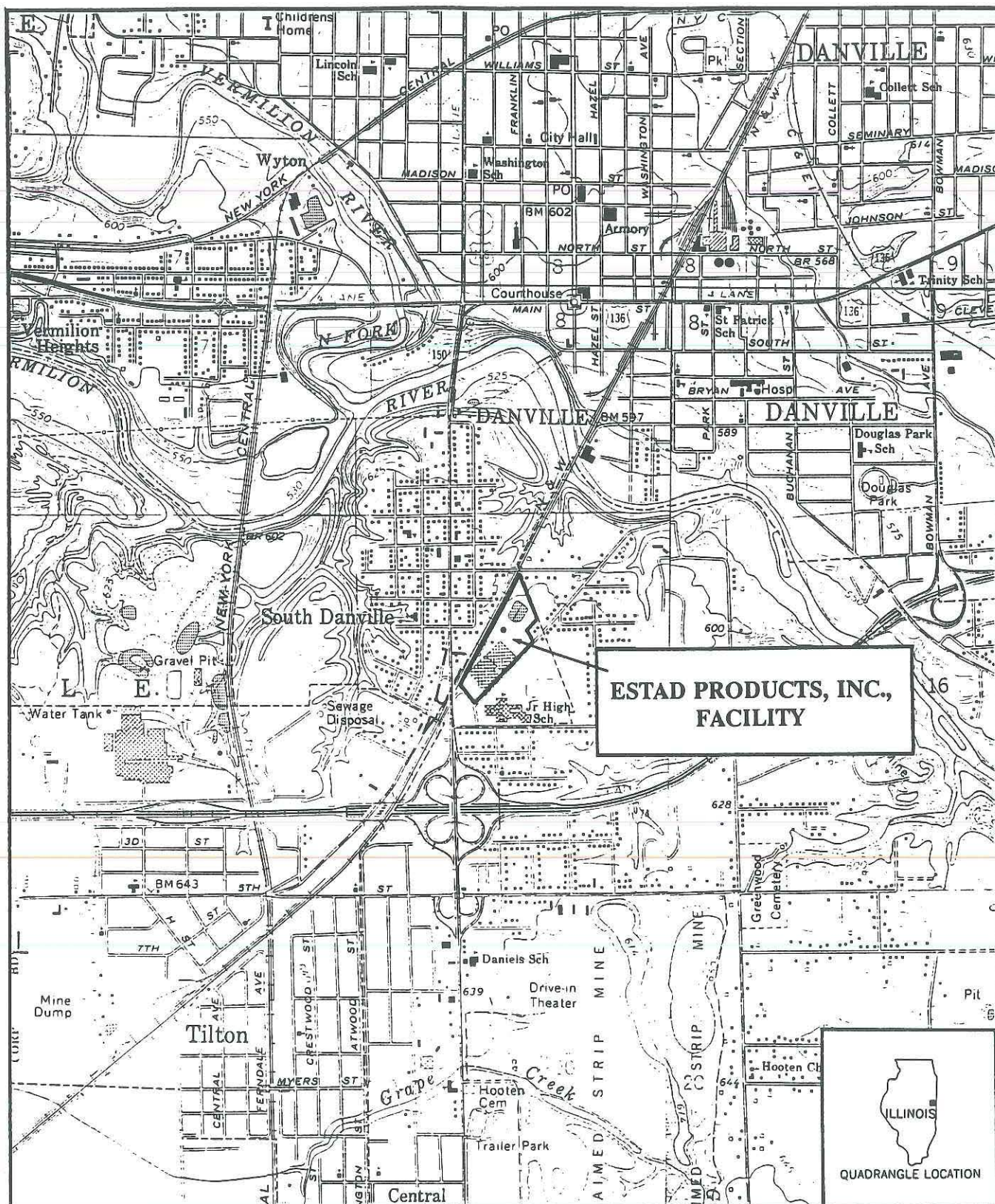


FIGURE 1
FACILITY LOCATION
ESTAD PRODUCTS, INC.
DANVILLE, ILLINOIS

Source: Modified from USGS, 1966

Prior to 1984, ATI owned and operated the facility. ATI manufactured and packaged cosmetic, household, pharmaceutical, medicinal, and automotive products in aerosol, liquid, and solid stick forms. Raw materials used during ATI's operations included acetone, formaldehyde, methanol, tetrachloroethene, toluene, and tetrachloroethane (ATI, 1980b). There was no information available during the VSI, nor in EPA or IEPA files at the time of the VSI, regarding the manner in which ATI stored the raw materials or the types of processes involved in ATI's manufacturing operations. ATI ceased manufacturing operations at the facility around March 1982; however, ATI owned the facility and employed a clerical staff at the facility until about 1984.

Glenn Savage of IEPA, conducted a RCRA compliance inspection at the facility on June 9, 1982. The IEPA inspection report confirmed that the facility was no longer conducting manufacturing operations, but did not provide information regarding ATI operations or RCRA waste management units at the facility (IEPA, 1982). During a telephone conversation with Dynamac subsequent to the VSI, Mr. Savage stated that at the time of his June 1982 inspection of the facility, all personnel familiar with the facility's manufacturing operations had already been dismissed. Mr. Savage remembered an indoor drum storage area at the facility which he believed ATI used to store only products (Dynamac, 1992a).

There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding when ATI began operations at this location, the number of people employed at ATI, or the use of the facility prior to ATI's purchase of the facility. However, a 1973 aerial photograph indicates the facility was operating in 1973. Mr. Savage could not recall this information, either. File information indicated ATI headquarters was located in Totowa, New Jersey. Dynamac contacted the information service for this city; however, there was no listing for the company. Dynamac also contacted the Illinois Corporation Information Bureau (ICIB) for information about ATI. The ICIB had a listing for ATI as a foreign (New York) company. According to the ICIB, ATI was doing business in Illinois as a foreign (New York) company which was no longer qualified to do business in Illinois as of December 1985. The ICIB did not have any further information regarding ATI (Dynamac, 1992d). In addition, Dynamac contacted an IEPA representative at the Champaign, Illinois, office, but this office did not have any file information for the facility in any of its division files (Dynamac, 1992b).

2.3 WASTE GENERATION AND MANAGEMENT

Wastes have been generated and managed at several locations at the facility. SWMUs and their current status are identified in Table 1. The locations of known SWMUs and AOCs in relation to the facility layout are shown in Figure 2. Wastes generated and managed at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes is discussed below.

There are no hazardous wastes currently being generated at the facility. According to ATI's 1980 Notification of Hazardous Waste Activity (Notification), ATI formerly generated the following hazardous wastes: spent halogenated solvents (F002); spent nonhalogenated solvents (F005); waste acetone (U002); waste formaldehyde (U122); waste

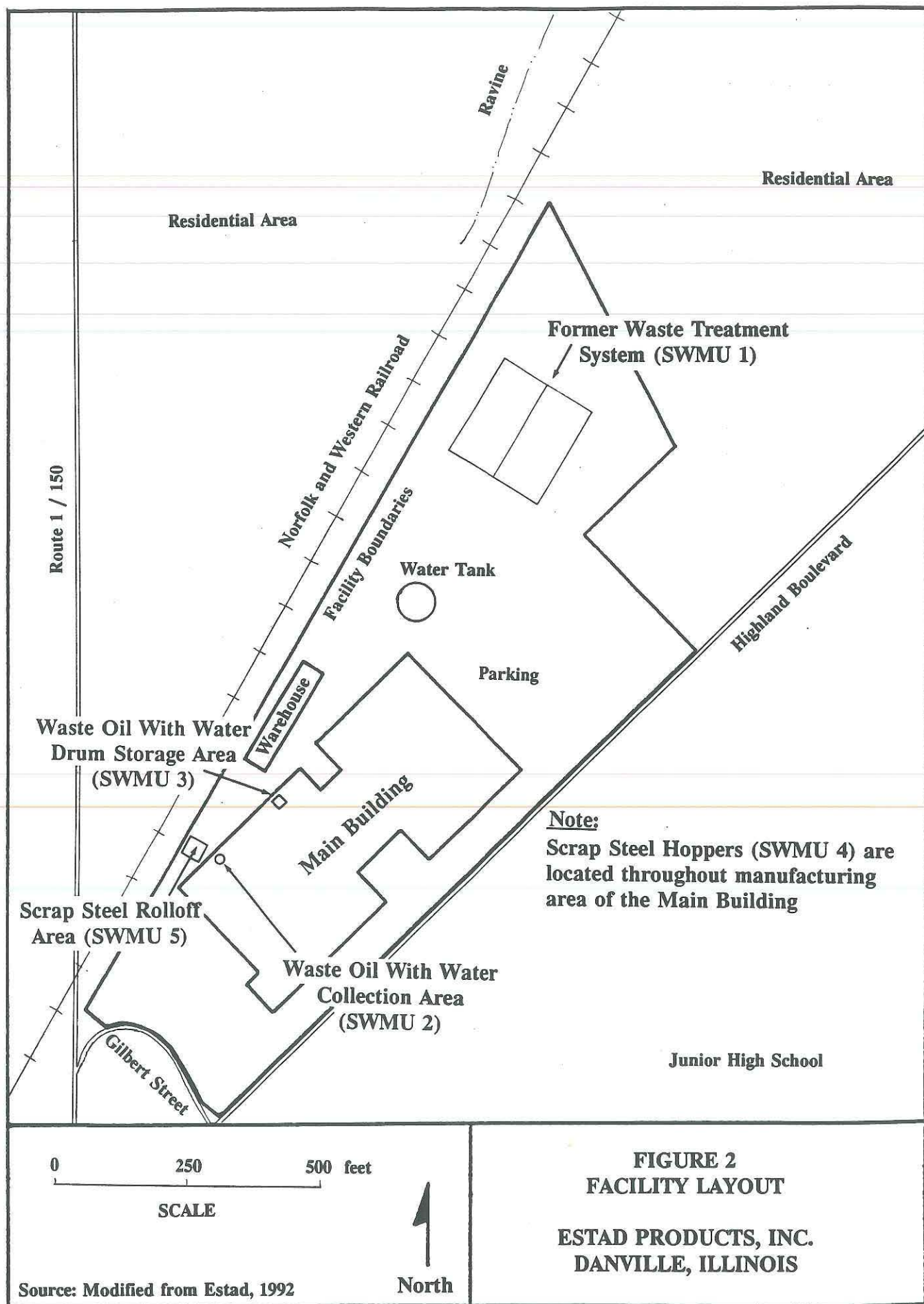
TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit ^a	Status
1	Former Waste Treatment System	Yes ^b	Inactive; no documentation of RCRA closure
2	Waste Oil With Water Collection Area	No	Active for collection of nonhazardous waste
3	Waste Oil With Water Drum Storage Area	No	Active for storage of nonhazardous waste
4	Scrap Steel Hoppers	No	Active for storage of nonhazardous waste
5	Scrap Steel Rolloff Area	No	Active for storage of nonhazardous waste

Notes:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

^b This unit was identified on ATI's 1980 Part A; however, there was no information available during the VSI, nor in EPA or IEPA files concerning what types of waste were treated at this unit or whether the unit was required to undergo RCRA closure.



**TABLE 2
SOLID WASTES**

Waste/EPA Waste Code ^a	Source	Solid Waste Management Unit
Spent halogenated solvents/ F002	ATI manufacturing operations	Unknown ^b
Spent nonhalogenated solvents/ F005	ATI manufacturing operations	Unknown ^b
Waste acetone/U002	ATI manufacturing operations	Unknown ^b
Waste formaldehyde/U122	ATI manufacturing operations	Unknown ^b
Waste methanol/U154	ATI manufacturing operations	Unknown ^b
Waste tetrachloroethene/U210	ATI manufacturing operations	Unknown ^b
Waste toluene/U220	ATI manufacturing operations	Unknown ^b
Waste tetrachloroethane/U226	ATI manufacturing operations	Unknown ^b
Waste oil with water/ NA	Estad parts cleaning and machinery maintenance	2, 3
Scrap steel/NA	Estad manufacturing operations	4, 5

Notes:

^a Nonapplicable (NA) designates nonhazardous waste.

^b This waste was identified on ATI's 1980 Notification. There was no documentation available during the VSI, nor in EPA or IEPA files concerning how and where this waste was generated and managed. However, this waste may have been managed at SWMU 1.

methanol (U154); waste tetrachloroethene (U210); waste toluene (U220); and waste tetrachloroethane (U226) during its manufacturing operations at the facility (ATI, 1980b). Estad does not and has not generated hazardous wastes at this facility since acquiring it around 1984. Estad currently generates nonhazardous waste oil with water and scrap steel. No wastes have been generated by CSDSC at this location. There was no further information available during the VSI, nor in EPA or IEPA files regarding any hazardous or nonhazardous wastes formerly generated by ATI.

According to its 1980 Notification, ATI formerly generated F002 and F005 wastes, as well as U002, U122, U154, U210, U220, and U226 wastes at the facility. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI concerning the location or method of generation and management, the name and location of the transporter and disposal facility, the final disposition of the wastes, or the quantity of these wastes generated by ATI. The Former Waste Treatment System (SWMU 1) is the only unit documented in the available file information, and ATI may have managed the above-mentioned hazardous wastes in this unit. ATI's 1980 Part A permit application (Part A) is incomplete; only the first two pages of the Part A were available in agency files at the time of the PA/VSI. In a cover letter from ATI included with the facility's Notification and Part A, ATI stated it had originally thought a Part A would not be required, but because of an "on-site waste treatment facility" (SWMU 1), ATI concluded it was necessary to file the Part A. The cover letter also stated ATI was unable to complete the Part A at that time, but would forward a completed form as soon as possible (ATI, 1980b). There was no further information available in EPA or IEPA files at the time of the PA/VSI regarding the Former Waste Treatment System (SWMU 1).

During the VSI, the Estad representative stated there had been two adjacent unlined "water treatment lagoons" in the northern-most corner of the facility when Estad purchased it in 1984. Estad's manufacturing operations did not require use of the lagoons, so Estad backfilled the lagoons with soil. The Estad representative believed these lagoons were the Former Waste Treatment System (SWMU 1) that ATI identified on the Part A; he could not recall any other details about the lagoons except that there were steel catwalks over each one. According to a USGS topographic map and a 1973 aerial photograph of the lagoons (see Attachment D for the 1973 aerial photograph), the lagoons were each about 1 acre in size (USGS, 1966).

Estad generates approximately 200 gallons of nonhazardous waste oil with water per week from cleaning parts and machinery maintenance at the facility. The facility collects this waste in 55-gallon steel drums located at the Waste Oil With Water Collection Area (SWMU 2). When the facility accumulates about four 55-gallon drums of this waste, an employee transfers the drums to the Waste Oil With Water Drum Storage Area (SWMU 3) prior to shipping the waste off site. Ashland Chemical Company, located in Milwaukee, Wisconsin, transports this waste off site to an Eco-Guard, Inc., facility, located in Troy, Indiana, for treatment and recycling.

Estad also generates approximately 10,000 pounds of nonhazardous scrap steel per week from manufacturing operations at the facility. The facility collects this waste at one of numerous Scrap Steel Hoppers (SWMU 4) located throughout the facility. When a hopper becomes full, the facility transfers the waste to the Scrap Steel Rolloff Area (SWMU 5) prior to shipping the waste off site. Mervice Industries, Inc., transports this waste off site to its facility in Danville, Illinois, for recycling.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to on-site soil, ground water, surface water, and air at the facility.

In April of 1980, approximately 100 gallons of a biodegradable mild detergent used by ATI to make shampoo leaked from a faulty unloading mechanism associated with a tank truck. All but about 10 gallons of the material was collected into a drain system that discharged to the lagoons at the facility, where the material was diluted with water. Runoff from the rain at the time of the incident washed about 10 gallons of this material into the Norfolk and Western rail bed located adjacent to the facility (ATI, 1980a). IEPA visited the facility in response to a complaint of an excessive amount of an unusual foaming material along the rail line. The facility determined this foaming action occurred due to the combined action of the rain, wind, and detergent. IEPA did not require any follow-up action as a result of this release (IEPA, 1980).

There have been no other documented releases at the facility.

2.5 REGULATORY HISTORY

ATI submitted a Notification as a generator of hazardous waste and a treatment, storage, or disposal (TSD) facility to EPA on November 19, 1980. ATI also submitted a Part A as a TSD facility to EPA on November 19, 1980. ATI's Part A was incomplete; ATI only submitted the first two pages of the Part A. The Part A did not list any process codes, unit capacities, estimated annual waste quantities, or waste codes. In the cover letter from ATI included with the facility's Notification and Part A, ATI stated it had originally thought a Part A would not be required, but because of an "on-site waste treatment facility" (SWMU 1), ATI concluded it was necessary to file the Part A. The cover letter also stated ATI was unable to complete the Part A at that time, but would forward a completed form as soon as possible (ATI, 1980b). A copy of a completed Part A was not in EPA or IEPA files at the time of the PA/VSI, nor was there additional information available regarding the waste treatment facility.

During the VSI, the Estad representative stated there had been two adjacent unlined "water treatment lagoons" in the northern-most corner of the facility when Estad purchased it in 1984. Estad's manufacturing operations did not require use of the lagoons, so Estad backfilled the lagoons with soil. The facility representative believed these lagoons were the

Former Waste Treatment System (SWMU 1) that ATI identified on the Part A; however, he could not recall any other details about the lagoons except that there were formerly steel catwalks over each one. According to a USGS topographic map and a 1973 aerial photograph of the lagoons (see Attachment D for the 1973 aerial photograph), the lagoons were each about 1 acre in size (USGS, 1966). There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding whether the facility ever conducted, or was required by EPA or IEPA to conduct, RCRA closure of its Former Waste Treatment System (SWMU 1); however, according to IEPA, the facility is not currently regulated as a hazardous waste generator under RCRA (Dynamac, 1992b).

Dynamac found no documentation of RCRA compliance problems at the facility. There was no information available during the VSI, nor in EPA or IEPA files which indicates that the IEPA cited the facility for operating without an approved Part A. In 1982, IEPA conducted a RCRA compliance inspection at the facility. At the time of the inspection, the facility was no longer conducting manufacturing operations; there was only a clerical staff still present at the facility. The inspection report indicated an ATI employee stated that all hazardous waste had been removed from the facility and ATI was no longer generating hazardous waste. The IEPA inspector told the employee that ATI must contact IEPA if the facility began generating hazardous waste in the future. The IEPA did not cite the facility for any violations as a result of the 1982 inspection (IEPA, 1982). There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding any subsequent IEPA inspections at the facility.

Estad is not required to have an operating air permit. There was no information available in EPA or IEPA files regarding whether ATI was required to have an air permit for its operations.

Estad is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. There was no information available in EPA or IEPA files at the time of the PA/VSI regarding whether ATI was required to have an NPDES permit. There has not been any CERCLA (Superfund) activity at the facility.

The Estad facility representative stated he is not aware of any underground storage tanks (UST) ever being present at the facility. There was no information available in EPA or IEPA files at the time of the PA/VSI regarding any UST activity at the facility.

In April 1984, Estad hired a contractor to remove four polychlorinated biphenyl (PCB)-containing transformers at the facility. St. Joseph Motor Lines of Atlanta, Georgia, transported the transformers to SCA Chemical Services, Inc. (SCA), located in Model City, New York. SCA drained and flushed each transformer, and then disposed of the four empty transformers (SCA, 1984). According to the Estad facility representative, none of the transformers had leaked any PCB-containing oil to the environment and no spills of PCB-containing oil occurred during removal activities.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the Estad facility.

2.6.1 Climate

No climatic data are available for the Danville area. Climatic data from a nearby community, Bloomington - Normal, Illinois, were used for this summary. Bloomington - Normal is located approximately 80 miles west of Danville. The climate in Bloomington - Normal is continental. The average daily temperature is 52.5° Fahrenheit (F). The lowest average daily temperature is 25.4° F in January. The highest average daily temperature is 75.7° F in July (NOAA, 1975).

Mean annual precipitation is 36.41 inches (NOAA, 1975). Mean annual lake evaporation for the area is about 32 inches. The 1-year, 24-hour maximum rainfall is approximately 2.7 inches (NOAA, 1979).

The prevailing wind is from the south. Average wind speed is highest in April at 12 miles per hour from the south (NOAA, 1975).

2.6.2 Flood Plain and Surface Water

The Estad facility is located in an area of minimal flooding, outside the 100-year or 500-year flood plain of any surface water body (FEMA, 1983). Surface water runoff from the majority of the facility is directed toward one of several drains which discharge to the Danville Sanitation Department. However, runoff from the northern portion of the facility flows into a ravine which discharges to the Vermilion River approximately 0.5 miles north of the facility. The Vermilion River is the nearest surface water body, and is used for recreational fishing, and receives treated sewage and nontreated storm water discharge. The Vermilion River is impounded to form Lake Vermilion approximately 4 miles north and upstream of the facility. Lake Vermilion is used for municipal drinking water supplies in the Danville area (Dynamac, 1992c).

2.6.3 Geology and Soils

The soils of the Estad facility are mapped as urban land, Orthents/loamy, Strawn silt loam, and Martinsville silt loam. Urban land and orthents/loamy soils have been disturbed by cutting, filling, or paving. Strawn silt loam is a deep, steeply sloping, well drained, moderately permeable soil formed in drainage breaks along streams. Martinsville silt loam is a deep, well drained, moderately permeable soil formed in loess overlying outwash material (SCS, undated).

The surficial deposits in the area around the facility are mapped as the Batestown Till Member of the Wedron Formation. The Batestown Till is a gray silty till deposited during the latest Pleistocene glaciation, and may include some areas of outwash (Lineback, 1979). The total thickness of the unconsolidated deposits is approximately 15 to 25 feet in the vicinity of the Estad facility, and over 100 feet in the buried Danville Valley, which trends south to north approximately one mile east of the facility (Kempton, Morse, and Visocky, 1982). Prior to glaciation, the Danville Valley was a tributary of the Mahomet and Ancient Mississippi Valleys of Central Illinois (Selkregg and Kempton, 1958).

The bedrock in the vicinity of the facility is the Pennsylvanian-aged Carbondale Formation. The uppermost unit of this formation is the Danville Coal, which has been extensively strip mined in the vicinity of the facility. The Carbondale Formation consists of a number of thin coal seams separated by shales, sandstones, and limestones. The Carbondale Formation is up to 150 feet thick and is underlain by the similar Pennsylvanian-aged Tradewater and Caseyville Formations, which total approximately 600 feet thick. A great thickness of Paleozoic rocks underlies the Pennsylvanian-age rocks in this area (Selkregg and Kempton, 1958).

2.6.4 Ground Water

There are no monitoring wells in place at the facility and ground-water flow direction is not documented. Based on the topography and surface water of the vicinity, it is likely that ground water in the surficial aquifer flows north towards the Vermilion River, but the depth to ground water cannot be estimated accurately because of the steep bedrock slope down to the river (USGS, 1966).

The deep glacial deposits filling the buried Danville Valley contain sand and gravel deposits, which are productive aquifers. Extensive sand and gravel deposits are encountered between 80 and 140 feet below ground surface (bgs) and also at depths greater than 200 feet bgs. Wells drilled in these deposits yield between 25 and 550 gallons per minute. The hydraulic conductivity ranges from 440 to 830 gallons per day per square foot (Kempton, Morse, and Visocky, 1982). In the bedrock, there are occasional productive zones in the limestone units, but the quality of the water is poor. As a result, most industrial wells in the area draw from surficial aquifers wherever available (Selkregg and Kempton, 1958).

Municipal drinking water supplies in the area of the facility are derived from surface water intakes on Lake Vermilion, which is located approximately 4 miles north and upstream of the facility on the Vermilion River (Dynamac, 1992c; USGS, 1966).

2.7 RECEPTORS

The Estad facility occupies a total of about 10 acres of land in a mixed commercial, industrial, and residential area in Danville, Illinois, which had a 1990 population of 38,985 persons (State of Illinois, 1991).

The facility is bordered on the northwest by a Norfolk and Western rail line, across from which is a residential area; on the northeast by a residential area; on the southwest by Gilbert Street; and on the southeast by Highland Boulevard, across from which is Southview Junior High School. The nearest residences are located immediately adjacent to the northwest side of the facility. The nearest school, Southview Junior High School, is located approximately 0.2 mile southeast of the facility. There are 16 other schools located within 2 miles of the facility (USGS, 1966). Access to the facility is not controlled, but the only waste Estad stores outdoors is nonhazardous scrap steel. Access to the building at the facility is controlled by an electronic security system. Access to SWMU 1 is controlled by an eight-foot high chain-link fence with barbed-wire.

Surface water runoff from the majority of the facility is directed toward one of several drains which discharge to the Danville Sanitation Department. Runoff from the northern-most corner of the facility is directed toward a drainage ditch which slopes toward the Vermilion River. The Vermilion River is the nearest surface water body, located about 0.5 mile northeast of the facility. The Vermilion River is used for recreational fishing, and receives treated sewage discharge as well as nontreated storm water runoff. The Vermilion River is not used for industrial or drinking water supplies (Dynamac, 1992c).

Ground water in the area of the facility is not used as a drinking water source. According to Mike Witt of the Danville Water Department, the City of Danville obtains its drinking water from Lake Vermilion, which is located approximately 4 miles north and upstream of the facility (Dynamac, 1992c).

The nearest sensitive environment is the Vermilion River, located about 0.5 miles northeast of the facility. Other sensitive environments located in the area of the facility include Stoney and Lick Creeks, located about 1.5 and 2.0 miles east of the facility, respectively; several open-water ponds, each less than 2 acres in size and located within one mile southwest of the facility; and numerous open-water and forested ponds ranging in size from about 3 acres to about 10 acres (USDI, undated). These ponds are occasionally used for recreational fishing, but are not used for industrial or drinking water supplies (Dynamac, 1992c).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU; description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Waste Treatment System

Unit Description:

The Former Waste Treatment System was located in the northern-most corner of the facility and consisted of an area containing two adjacent unlined lagoons, each about 1 acre in size (see Attachment D for a 1973 aerial photograph showing the lagoons in relation to the facility). The unit is surrounded by an eight-foot high chain-link fence with barbed-wire. Prior to 1984, there were steel catwalks over each lagoon. ATI identified this unit in the cover letter included with its 1980 Notification and Part A. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding this unit's capacity, where the unit discharged to, or the types of waste managed in this unit. Estad removed the catwalks and backfilled the lagoons with soil around 1984.

Date of Startup:

This unit began operation at an unknown date prior to 1973.

Date of Closure:

This unit became inactive sometime before 1982. There was no information available in EPA or IEPA files at the time of the PA/VSI regarding whether ATI ever conducted, or was required by EPA or IEPA to conduct, RCRA closure of this unit.

Wastes Managed:

There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding the type of waste managed in this unit. However, the cover letter accompanying the facility's 1980 Notification and Part A indicated this unit managed one or more of the following hazardous wastes: spent halogenated solvents (F002); spent nonhalogenated solvents (F005); waste acetone (U002); waste formaldehyde (U122); waste methanol (U154); waste tetrachloroethene (U210); waste toluene (U220); and waste tetrachloroethane (U226).

Release Controls:

There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding the types of release controls associated with this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: At the time of the VSI, this unit had been filled in and was covered by thick vegetation and there was no visible evidence of catwalks associated with the unit (see Photo No. 1). There were no visible stains or evidence of a release in the area of this unit.

SWMU 2 Waste Oil With Water Collection Area

Unit Description: The Waste Oil With Water Collection Area consists of a designated portion of the concrete floor located in the southwest corner of the building at the facility. The unit measures approximately 16 square feet in size and manages nonhazardous waste in up to four 55-gallon steel drums.

Date of Startup: This unit began operation around 1984.

Date of Closure: This unit is active.

Wastes managed: This unit manages nonhazardous waste oil with water, which is shipped off site for treatment and recycling.

Release Controls: This unit manages nonhazardous waste in closed 55-gallon steel drums situated on wood pallets which are located indoors on a concrete floor with no drains. There are no other release controls associated with this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed the unit, which contained four 55-gallon steel drums of nonhazardous waste oil with water (see Photo No. 2). The concrete floor in the area of the unit was stained in some places with an oily substance. There were no visible cracks in the concrete floor of this unit.

SWMU 3 Waste Oil With Water Drum Storage Area

Unit Description: The Waste Oil With Water Drum Storage Area consists of a designated portion of the concrete floor located in the southwest corner of the building at the facility. This unit measures approximately 75 square feet and is used to manage nonhazardous waste in 55-gallon steel drums. This unit has the capacity to store about thirty 55-gallon drums.

Date of Startup:	This unit began operation around 1984.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous waste oil with water. Estad ships this waste off site for treatment and recycling.
Release Controls:	This unit manages waste indoors in closed 55-gallon steel drums on a concrete floor with no floor drains. There are no other release controls associated with this unit.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Dynamac observed the 75-square-foot area which did not contain any waste at the time of the VSI. The area did contain a closed empty drum and some raw materials (see Photo No. 3). The concrete floor in the area of this unit was stained in some places with an oily substance. There were no visible cracks in the concrete floor.

SWMU 4

Scrap Steel Hoppers

Unit Description:	The Scrap Steel Hoppers consist of about 15 steel 1-cubic-yard hoppers located on a concrete floor throughout the facility. The units are used to manage nonhazardous waste from manufacturing operations at the facility.
Date of Startup:	These units began operation around 1984.
Date of Closure:	These units are active.
Wastes Managed:	These units manage nonhazardous scrap steel, which is transported off site for recycling.
Release Controls:	These units manage solid pieces of steel indoors in steel hoppers located on a concrete floor with no floor drains. There are no other release controls associated with these units.
History of Documented Releases:	No release from these units have been documented.
Observations:	Dynamac observed several of these units located throughout the facility (see Photo No. 4). The concrete floor in the area of one of these units was stained with an oily substance. There were no visible cracks in the concrete floor in the area of these units during the VSI.

SWMU 5**Scrap Steel Rolloff Area****Unit Description:**

The Scrap Steel Rolloff Area consists of a sloped concrete pad located outdoors in the southwest corner of the facility. The unit measures about 600 square feet, contains 2 steel 20-cubic-yard rollofs, and is surrounded by an approximately 2-foot concrete berm on three sides.

Date of Startup:

The unit began operation around 1984.

Date of Closure:

The unit is active.

Wastes Managed:

The unit manages nonhazardous scrap steel, which is transported off site for recycling.

Release Controls:

The unit manages solid pieces of steel in steel rollofs located on a sloped concrete pad with no drains, and is surrounded by a 2-foot concrete berm on 3 sides. There are no other release controls associated with the unit.

**History of
Documented Releases:**

No releases from the unit have been documented.

Observations:

Dynamac observed the two rolloff boxes at this unit; there were no visible stains or evidence of release (see Photo No. 5).

4.0 AREAS OF CONCERN

Dynamac did not identify any AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the Estad facility. Background information on the facility's location, operations, waste generation and management, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. Following are Dynamac's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 Former Waste Treatment System

Conclusions:

The Former Waste Treatment System consisted of an area containing two adjacent unlined lagoons, each about 1 acre in size (see Attachment D for a 1973 aerial photograph showing the lagoons in relation to the facility). The unit is surrounded by an eight-foot high chain-link fence with barbed-wire. ATI identified this unit in the cover letter included with its 1980 Notification and Part A. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding this unit's capacity, where the unit discharged to, or the types of waste managed in this unit. There was also no documentation available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding whether this unit was required to have an NPDES permit or to undergo RCRA closure. The cover letter accompanying ATI's 1980 Notification and Part A indicated this unit managed one or more of the following hazardous wastes: spent halogenated solvents (F002); spent nonhalogenated solvents (F005); waste acetone (U002); waste formaldehyde (U122); waste methanol (U154); waste tetrachloroethene (U210); waste toluene (U220); and waste tetrachloroethane (U226). Estad backfilled the lagoons with soil around 1984. No releases from this unit have been documented. The potential for a release to environmental media from this unit is discussed below.

On-Site Soil: High. There was no documentation available at the time of the PA/VSI regarding the types of hazardous waste managed at this unit. For this reason, and due to the release controls described above, there is a high potential for a release to on-site soil from this unit.

Ground Water: High. Although the depth to ground water is not documented, the soil in the area of the facility consists of moderately permeable unconsolidated till and the lagoons were unlined. For these reasons, and because this unit most likely contained a high volume of a liquid waste, there is a high potential for a release to ground water from this unit.

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Surface Water: Moderate. There is a moderate potential for a release to surface water from this unit via a ravine which slopes toward the Vermilion River and is located immediately northwest of this unit along the Norfolk and Western rail line. Although the direction of ground-water flow in the area of the facility is not documented, it is likely to be north toward the Vermilion River. For this reason, there is also a moderate potential for a release to surface water from this unit via ground water discharge to the Vermilion River, which is located about 0.5 mile northeast of the facility.

Air: Low. There was no information available during the VSI, nor in EPA or IEPA files at the time of the PA/VSI regarding the type of waste managed at this unit. Although there may have been past historical release to air from this unit, there is a low potential for a future release to air from this unit because the unit has been inactive since before 1982 and Estad backfilled the lagoons with soil around 1984.

Recommendations: Dynamac recommends the facility conduct soil and ground water sampling to determine the extent of contamination from possible past releases of hazardous constituents, particularly volatile organic compounds.

SWMU 2 Waste Oil With Water Collection Area

Conclusions: The Waste Oil With Water Collection Area is located indoors and consists of a designated concrete-floored area with no floor drains. The unit is used to manage nonhazardous waste oil with water in closed 55-gallon steel drums situated on wood pallets. At the time of the VSI, the concrete floor in the area of the unit was stained in some places with an oily substance, but there were no visible cracks in the concrete floor. No releases from this unit have been documented. The potential for a release to all environmental media is low.

Recommendations: Dynamac recommends no further action for the unit at this time.

SWMU 3 Waste Oil With Water Drum Storage Area

Conclusions: The Waste Oil With Water Drum Storage Area is located indoors and consists of a designated concrete-floored area. The unit is used to manage nonhazardous waste in closed 55-gallon steel drums and has the capacity to store about thirty 55-gallon drums. There are no floor

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drains in the area of this unit. At the time of the VSI, the concrete floor in the area of this unit was stained in some places with an oily substance, but there were no visible cracks in the concrete floor. No releases from this unit have been documented. The potential for a release to all environmental media from this unit is low.

Recommendations: Dynamac recommends no further action for the unit at this time.

SWMU 4 Scrap Steel Hoppers

Conclusions: The Scrap Steel Hoppers consist of about fifteen steel hoppers located indoors on a concrete floor with no floor drains. The units are used to manage nonhazardous scrap steel. At the time of the VSI, the concrete floor in the area of one of these units was stained with an oily substance; however, Dynamac did not observe any cracks in the floor near these units. No releases from these units have been documented. The potential for a release to all environmental media from these units is low.

Recommendations: Dynamac recommends no further action for these units at this time.

SWMU 5 Scrap Steel Rolloff Area

Conclusions: The Scrap Steel Rolloff Area consists of a concrete pad with no drains located outdoors. The unit contains two steel rollofs used to manage nonhazardous scrap steel. At the time of the VSI, there were no visible stains or evidence of release in the area of the unit. No releases from this unit has been documented. The potential for a release to all environmental media from this unit is low.

Recommendations: Dynamac recommends no further action for the unit at this time.

**TABLE 3
SWMU SUMMARY**

<u>Solid Waste Management Unit</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Former Waste Treatment System	Pre-1973 to about 1982	None	Conduct soil and ground water sampling to determine if a release has occurred; initiate RCRA closure, as necessary
2. Waste Oil With Water Collection Area	1984 to the present	None	None
3. Waste Oil With Water Drum Storage Area	1984 to the present	None	None
4. Scrap Steel Hoppers	1984 to the present	None	None
5. Scrap Steel Rolloff Area	1984 to the present	None	None

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REFERENCES

- Aerosol Techniques, Inc. (ATI), 1980a. Letter to John Applegate, Illinois Environmental Protection Agency (IEPA), from C.H. Clapp, ATI, regarding an April 8, 1980 spill of a mild detergent at the facility, April 18.
- ATI, 1980b. Letter to U.S. Environmental Protection Agency from William Hirst, ATI, regarding the facility's "waste treatment facility" and which includes ATI's November 19, 1980, Notification of Hazardous Waste Activity, and Part A permit application (incomplete), November 19.
- Dynamac Corporation (Dynamac), 1992a. Record of telephone conversation between Glenn Savage, IEPA, and Deborah Hall, Dynamac, regarding ATI operations at the Estad Products, Inc. (Estad), facility in Danville, Illinois, December 9.
- Dynamac, 1992b. Record of telephone conversation between Amy Brown, IEPA, and Deborah Hall, Dynamac, regarding file information and regulatory status of the Estad (formerly ATI) facility, December 10.
- Dynamac, 1992c. Record of telephone conversation between Mike Witt, Danville Water Department, and Deborah Hall, Dynamac, regarding surface-water and ground-water use in the Danville area, December 15.
- Dynamac, 1992d. Record of telephone conversations between the Illinois Corporate Information Bureau and the Totowa, New Jersey, information service, with Deborah Hall, Dynamac, December 19.
- Estad, 1992. Diagram of the facility obtained during the VSI.
- Federal Emergency Management Agency (FEMA), 1983. Flood Insurance Rate Map of Danville, Illinois, July 18.
- IEPA, 1980. Internal Memorandum to the Division of Water Pollution Control, from John Applegate, regarding an April 8 spill of a mild detergent at the ATI facility, April 9.
- IEPA, 1982. Letter to A. Julian, ATI, from Monte Nienkerk, IEPA, regarding a June 9, 1982 RCRA Inspection at the ATI facility, June 22.
- Kempton, J.P., W.J. Morse, and A.P. Visocky, 1982. Hydrogeologic Evaluation of Sand and Gravel Aquifers for Municipal Ground Water Supplies in East-Central, Illinois, Illinois State Geological Survey and Illinois State Water Survey, Cooperative Ground Water Report No. 8.

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Lineback, J.A., 1979. Quaternary Deposits in Illinois, Map, 1:500,000 scale.

National Oceanic and Atmospheric Administration (NOAA), 1975. Climate of Bloomington-Normal, Illinois.

NOAA, 1979. Climatic Atlas of the U.S., National Climatic Center, Ashville, North Carolina.

SCA Chemical Services, Inc. (SCA), 1984. Transformer Decommissioning, Disposal, and Destruction Record for four polychlorinated biphenyl-containing transformers at the Estad facility, May 8.

Selkregg, L.F., and J.P. Kempton, 1958. Ground Water Geology in East-Central Illinois, Illinois State Geological Survey, Circular No. 248.

Soil Conservation Service (SCS), undated. Unpublished field map of soils of Vermilion County, Illinois, based on 1980 aerial photography.

State of Illinois, 1991. Official Highway Map of Illinois.

U.S. Department of the Interior (USDI), undated. National Wetlands Inventory Map, 1:24,000 scale, Danville NE, NW, SE, and SW, Illinois, Quadrangles, based on 1981 and 1983 aerial photography.

U.S. Geological Survey (USGS), 1966. 7.5 Minute Series Topographic Map, Danville NE, NW, SE, and SW, Illinois, Quadrangles, 1:24,000, photorevised in 1978.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



EPA

**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT**

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 007 833 833
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II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Estad Products, Inc. (formerly Aerosol Techniques, Inc.)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 800 South Gilbert Street			
03 CITY Danville	04 STATE IL	05 ZIP CODE 61832	06 COUNTY Vermilion	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 40° 06' 40" N		LONGITUDE 87° 38' 00" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Take Highway 150 north from I-74 to Gilbert Street south. The facility is on the east side of the road, about 0.25 mile east of the road.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Handy Button Machine Company		02 STREET (Business, mailing, residential) 1750 North 25th Avenue			
03 CITY Melrose Park	04 STATE IL	05 ZIP CODE 60160	06 TELEPHONE NUMBER (708) 450-9000		
07 OPERATOR (if known and different from owner) Estad Products, Inc.		08 STREET (Business, mailing, residential) 800 South Gilbert Street			
09 CITY Danville	10 STATE IL	11 ZIP CODE 61832	12 TELEPHONE NUMBER (217) 442-4600		
13 TYPE OF OWNERSHIP (Check one) <input type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ <input type="checkbox"/> G. UNKNOWN (Specify)					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3010 DATE RECEIVED: MONTH DAY YEAR 11/19/80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input type="checkbox"/> YES DATE 11 / 18 / 92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): Dynamac Corporation			
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION Pre-1980 / Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Raw materials currently at the facility include a water-based paint primer and lubrication oil.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION There is a potential that hazardous constituents from an undocumented historical waste stream (pre-1982) have impacted on-site soil in an area which formerly contained two unlined lagoons. There is also a potential that the same hazardous constituents have migrated to area ground water and to the Vermilion River.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Deborah Hall		05 AGENCY	06 ORGANIZATION Dynamac Corporation	07 TELEPHONE NUMBER (312) 486-0222	08 DATE 11 / 18 / 92 MONTH DAY YEAR

ATTACHMENT B

**VISUAL SITE INSPECTION
SUMMARY AND
PHOTOGRAPHS**

VISUAL SITE INSPECTION SUMMARY

Estad Products, Inc., Facility
800 South Gilbert Street
Danville, Illinois 61832
ILD 007 833 833

Date: November 18, 1992

Primary Facility Representative: Paul Skinner, Vice President of Engineering;
Estad Products, Inc. (Estad)

Representative Telephone No.: (217) 442-4600

Inspection Team: Deborah Hall, Dynamac Corporation
Valerie Farrell, Dynamac Corporation

Photographer: Deborah Hall, Dynamac Corporation

Weather Conditions: Overcast; about 40° F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. The facility representative then discussed the facility's past and current operations, solid wastes generated, and release history. Mr. Skinner provided the inspection team with copies of requested documents.

The VSI tour of the facility began at 9:45 a.m. The inspection team walked outdoors to the southwest corner of the facility where Dynamac observed the Scrap Steel Rolloff Area (SWMU 5). The inspection team then walked indoors to the manufacturing areas where Dynamac observed several Scrap Steel Hoppers (SWMU 4). Next, the inspection team walked to the southwest corner inside the building at the facility. Here, Dynamac observed the Waste Oil With Water Collection Area (SWMU 2) and the Waste Oil With Water Drum Storage Area (SWMU 3).

Visual Site Inspection Summary
Estad Facility
November 18, 1992

The tour of the facility concluded at approximately 10:45 a.m., after which the inspection team held an exit interview with Mr. Skinner. The inspection team left the Estad building at approximately 11:30 a.m.

Following the VSI interview, the inspection team drove to the northern-most corner of the facility, where Dynamac observed the Former Waste Treatment System (SWMU 1). The inspection team left the facility at approximately 11:40 a.m.

PHOTOGRAPHS
ESTAD PRODUCTS, INC.
DANVILLE, ILLINOIS



Photo No.:
Orientation:
Description:

1

Northeast

The Former Waste Treatment System located in the northern-most corner of the facility. This area formerly contained two adjacent unlined lagoons. The area is currently covered with vegetation and is surrounded by an eight-foot high chain-link fence with barbed wire on the top.

Location: SWMU 1

Date: November 18, 1992

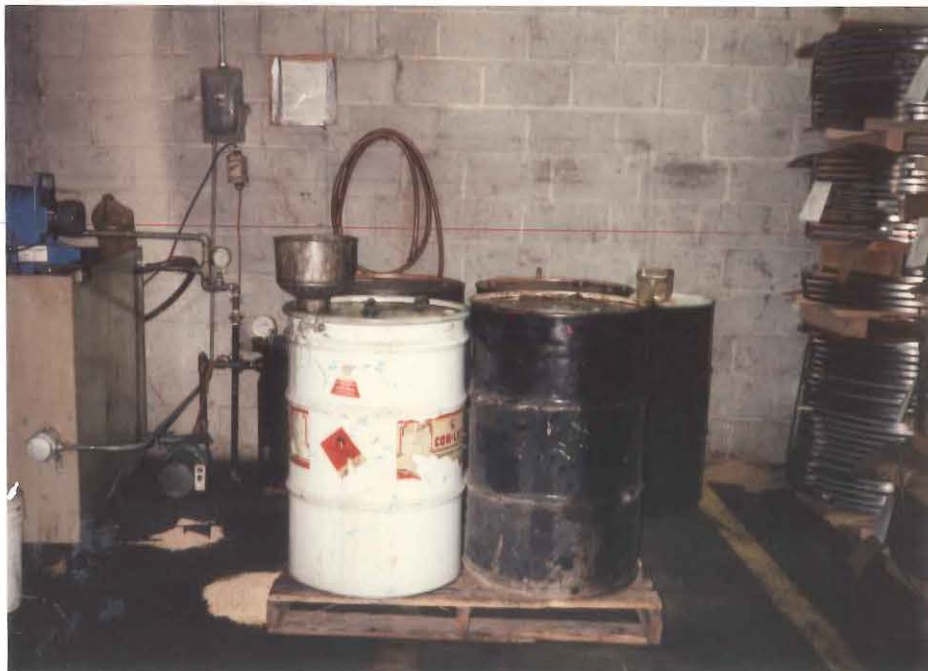


Photo No.:
Orientation:
Description:

2

Northwest

Four 55-gallon drums containing nonhazardous waste oil with water located at the Waste Oil With Water Collection Area in the building at the facility.

Location: SWMU 2

Date: November 18, 1992



Photo No.:
Orientation:
Description:

3

North

The Waste Oil With Water Drum Storage Area is located inside the building at the facility. At the time of the VSI, this area contained four empty drums (two closed, two open) and some raw materials, but did not contain any wastes.

Location: SWMU 3

Date: November 18, 1992



Photo No.:
Orientation:
Description:

4

Northwest

One of approximately fifteen Scrap Steel Hoppers located indoors throughout the facility.

Location: SWMU 4

Date: November 18, 1992



Photo No.: 5
Orientation: Northwest
Description: Two approximately 20-cubic-yard Scrap Steel Rolloffs located outdoors in the southwest corner of the facility.

Location: SWMU 5
Date: November 18, 1992

END OF PHOTOGRAPHS

ATTACHMENT C
VISUAL SITE INSPECTION
FIELD NOTES

11-18-82

ESTAD (Formerly ATI)
Danville, IL.

Weather: overcast ~40°F

Arrive @ facility @ ~9:05 a.m. and
inspection team (Deb Hare and Valerie
Farrell) met with Paul Skinner
(facility representative).

Deb discusses nature of inspection

- Estad purchased facility in ~1983 or 1984
- facility is ~10 acres with 200,000 sq. feet
under roof -
- ~85 employees (~60 in mfg)
-

lease out 1/2 bldg. to CSDS corp. for
(Central States Dist. Svc. Corp) warehouse
purposes (~100,000 sq. feet)

- ESTAD is owned by Handy Button Corp.
of Chicago, IL.
- Operates 1 shift (8 hrs) 5 days
- ADT security system w/ motion
detectors in facility.
- Mr. Skinner has little ⁰⁴ ~~knowledge~~
Knowledge of ATI's operations
- Has only been here 4 years.

2
ca

11-18-92

ESTAD (Continued)

- According to Mr. Skinner the facility does not generate any hazardous waste.

- Nature of Operations

ESTAD - makes casket shell hardware and accessories for 55-gal drum industries

- makes joint nails for furniture industries
- makes "mover bars" for moving industries

- Strictly metal stamping operations

- Wastes

- Scrap metal (all steel) shipped off site by Morris Steel of Danville
- collected in roll-off
- ~ 10,000 # per week.

- Waste water w/ oil

- Ashland Chemical transports it off site to Ecogard, Inc. (Troy, Ind.)
- ~ 200 gal per week - (recycled)
- analysis requested

Milwaukee, Wisc.

11-18-92

ESRAD (Continued)

Asbestos:

- is some in building associated with boiler pipes. Still in-tact and are not planning to remove.
- OSHA inspected facility last year and suggested that facility leave asbestos in place.

PCB's

- removed transformers when moved into facility. Requested info.

Painting:

- paint some parts with water-based paint. Use dip-method and do not generate any wastes.

UST's:

- the representative did not know of any tanks in past and there are no tanks on site now.

Air permit: none
NPDES Permit: none

JA

11-18-92

ESIAO (Continued)

Superfund: none

Release: none

Surface water run-off is collected by storm drains and directed to Danville Sanitation Department.

1:45 a.m. Begin facility walkthrough.

Photo 1: NW: Scrap Metal Roll-off.
2 @ ~40-cubic yards.

Photo 2: NW: Scrap Metal Roll-off.

Photo 3: NW: waste oil w/ water collection area - wait until accumulate ~30-40 drums and then ship off-site.

Photo 4: Down: full 55-gallon drums of waste oil are collected in this area prior to shipment off-site.

- Observed painting area - no odor water based paint, no waste generated.

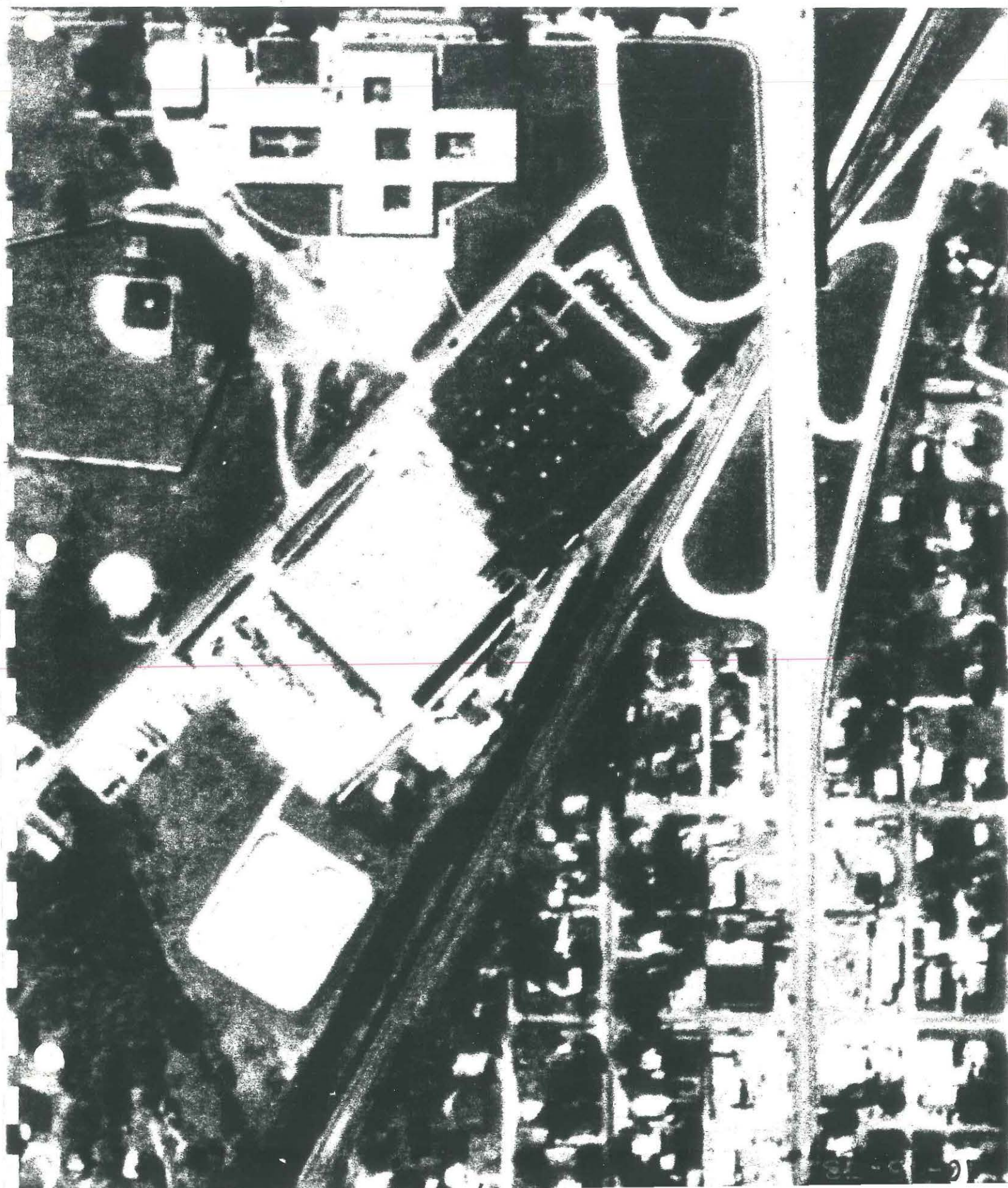
11-18-92

Hold exit meeting with facility representative - Mr. Skinner thought that the waste water treatment unit identified by ATI may have been some pits (lagoons) located along northwest portion of facility. ESTAD had these pits filled in and will supply inspection team with information.

- 2 pits - soil lined - with steel catwalks located above them.
 - No additional information
 - No ATI employees at ESTAD
 - ATI is no longer in business.
-
- Left facility at ~11:30.
 - Drove to back of facility to observe area where lagoons were formerly located
 - Drove around facility to determine potential receptors
 - ~~Take photo~~ Photo 5: N3: former lagoons

ATTACHMENT D

AERIAL PHOTOGRAPH OF THE FACILITY





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

*Rec'd 11/19/92
Compliance*

REPLY TO THE ATTENTION OF:

November 9, 1992

HRE-8J

Mr. Richard Hird, President
Estad Products, Inc.
P.O. Box 855
800 South Gilbert Street
Danville, Illinois 61832

Re: Visual Site Inspection
Estad Products, Inc.
(Former Aerosol Techniques, Inc.)
Danville, Illinois
ILD 007 833 833

Dear Mr. Hird:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

November 9, 1992

Page two

The VSI has been scheduled for November 18, 1992, at 9:00 a.m., at the Danville facility location. The inspection team will consist of Deborah Hall and Valerie Farrell of Dynamac Corporation, contractors for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the Conclusions and Executive Summary portions, will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

attachment

cc: Larry Eastep, Permit Section, IEPA
Amy Brown, Division of Land Pollution Control, IEPA
Paul Skinner, Vice President, Estad Products

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- o RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells
- o Closed and abandoned units
- o Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- o Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or a nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.